

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JAE LEE, on behalf of himself and all others  
similarly situated,

Plaintiff,

v.

TARO PHARMACEUTICALS U.S.A., INC.,

Defendant.

Case No. 7:23-cv-03834-CS

**PLAINTIFF'S NOTICE OF MOTION  
FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that, pursuant to Rule 23(e) and upon the accompanying papers, Plaintiff Jae Lee, on behalf of himself and all others similarly situated, will respectfully move this Court, before the Honorable Cathy Seibel, United States District Judge, at The Hon. Charles L. Briant Jr. Courthouse, 300 Quarropas St., White Plains, New York 10061, on a date and at such time as may be designated by the Court, for entry of an Order: (1) granting preliminary approval of the Parties' Settlement in accordance with the Proposed Order Granting Preliminary Approval of Class Action Settlement (Ex. 4);<sup>1</sup> (2) approving the Notice Program; (3) appointing RG2 as Settlement Administrator; (4) preliminarily certifying the Settlement Class for settlement purposes only; (5) appointing Jae Lee as Representative of the Settlement Class; (6) appointing Raina C. Borrelli of Turke & Strauss LLP as Settlement Class Counsel; (7) approving the form and content of the Short Form Notice (Ex. 1), Long Form Notice (Ex. 2), and Claim Form (Ex. 3); and (8) scheduling a Final Approval Hearing approximately 120 days after entry of a Preliminary Approval Order to consider entry of a final order approving the Settlement, final certification of the

<sup>1</sup> Exhibit references are to the Exhibits to the Parties' Stipulation and Settlement Agreement.

Settlement Class for settlement purposes only, and the request for attorneys' fees, costs, and expenses, and Plaintiff's service award.

Executed on January 26, 2024

/s/James J. Bilsborrow

James J. Bilsborrow (SB8204)  
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/s/Raina C. Borrelli

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*Attorneys for Plaintiff and Proposed Class*

**CERTIFICATE OF SERVICE**

I, Raina C. Borrelli, hereby certify that on January 26, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED this 26th day of January, 2024.

TURKE & STRAUSS LLP

By: /s/ Raina C. Borrelli  
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